

EXHIBIT 3

Updated Timeline
Prepared January 31, 2013

Start (if applicable)	Completion	Description
Present	3/30/2013	Fact finding continues. Outside Experts (O/E) perform/complete review of IDR responses provided in late December and January. Identify new or follow-up information needs, issue IDRs if needed, and review responses as received. Source code is provided mid-February, allowing start of code analysis.
3/30/2013	6/30/2013	O/E complete bulk of analysis. Requests for any identified and outstanding information needs (IDRs or, if applicable, interviews). Presentation to IRS before end of June of results of analysis able to perform to-date.
6/30/2013	7/15/2013	O/E complete evaluation and report results of analysis to IRS.
	7/19/2013	IRS completes analysis and presents conclusions to Taxpayer
7/19/2012	9/1/2013	Dialogue with Taxpayer on Issues – Determine if Room for Resolution
	9/1/2013	Resolution of Issue(s) or Issuance of 30-Day Letter
	12/31/2013	Statute Extension Date

Notes:

(1) This timeline is based on the expectation that throughout fact finding process information requests will be communicated to Taxpayer on a rolling basis and that complete responses to IDRs will be received within 2 weeks of the IDR in question being issued. In practice, IDR responses have regularly taken 4-5 weeks or longer, sometimes because of the size of the response but in other cases for less clear reasons. The majority of data intensive IDRs have been issued already, and based on what is currently known, we believe that all reasonably anticipated IDRs will be issued by June 30 (and most significantly sooner). However, if new information needs or sources are identified that it is sensible to develop, we may pursue additional information or interviews. Also, to date, at the request of the Taxpayer, we have used informal interviews by phone to develop the case as quickly as possible. We may, as previously discussed, pursue more formal interviews if deemed appropriate at some point.

(2) One significant variable remains the timing and manner of production of the source code that was originally requested in November. If the source code is produced by mid-February, allowing analysis to start mid-to-late February, the timeline is feasible. If there are continued delays in producing the code under satisfactory conditions for Elysium to conduct its analysis, that delay could jeopardize the timeline.